

Butler, David

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From: Butler, David
Sent: Wednesday, September 16, 2020 9:42 AM
To: Dulin, Rebecca Jean
Cc: Heather Smith; Nelson, Jeff; Dover, Becky; Grube-Lybarker, Carri; Bateman, Andrew; Edwards, Nanette; richard@rlwhitt.law; Samuel Wellborn; fellerbe@robinsongray.com; J. Blanding Holman; Jamey Goldin google; Weston Adams; court.walsh@nelsonmullins.com; thad@votesolar.org; Powers, John; Wessinger-Hill, JoAnne
Subject: RE: [EXTERNAL] Docket Nos. 2019-224-E and 2019-225-E - Request for Confidentiality

Rebecca:

I appreciate you pointing this out and answering my question. I believe you have taken care of my concerns at this point. If something else comes up, I will get back with you.

Thanks so much,

David Butler

Special Counsel

From: Dulin, Rebecca Jean <Rebecca.Dulin@duke-energy.com>
Sent: Wednesday, September 16, 2020 9:37 AM
To: Butler, David <David.Butler@psc.sc.gov>
Cc: Heather Smith <heather.smith@duke-energy.com>; Nelson, Jeff <jnelson@ors.sc.gov>; Dover, Becky <BDover@scconsumer.gov>; Grube-Lybarker, Carri <clybarker@scconsumer.gov>; Bateman, Andrew <abateman@ors.sc.gov>; Edwards, Nanette <nedwards@ors.sc.gov>; richard@rlwhitt.law; Samuel Wellborn <swellborn@robinsongray.com>; fellerbe@robinsongray.com; J. Blanding Holman <bholman@selcsc.org>; Jamey Goldin google <jameygoldin@google.com>; Weston Adams <weston.adams@nelsonmullins.com>; court.walsh@nelsonmullins.com; thad@votesolar.org; Powers, John <John.Powers@psc.sc.gov>; Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>
Subject: RE: [EXTERNAL] Docket Nos. 2019-224-E and 2019-225-E - Request for Confidentiality

David,

The confidentiality of the "Capacity Cost – Installed CT Cost (\$/KW)" is addressed in the Sept. 1, 2020 Transmittal Letter from the original filing in the following paragraph:

Table 2 of the NC REPS Compliance

Plan (Attachment I) on page 16 contains the Company's projected avoided energy costs and combustion turbine capacity costs. If this commercially sensitive business and technical information were to be publicly disclosed, it would allow competitors, vendors and other market participants to gain an undue advantage, which may ultimately result in harm to customers.

Moreover, the projected avoided energy costs reflect the Company's costs to procure additional energy and/or capacity. The wholesale electricity market is extremely competitive, and in order for the Company to obtain the most cost-effective energy and capacity to meet the needs of its customers, it must protect from public disclosure its projected and actual cost to procure such energy, capacity or both. In addition, if this information was made publicly available, potential suppliers would know the price against which they must bid, and rather than bidding the lowest price possible, they would simply bid a price low enough to beat the Company's projections.

The information in the "Capacity Cost" column is based on confidential information from a Duke-specific combustion turbine unit, and as a result, this information is designated as confidential in both the "current avoided cost" and "projected avoided cost" tables. Upon further review of this information in answering your question, the Companies realize that this is also the same information that this Commission deemed to be confidential in Order No. 2019-684, approving confidential treatment for certain elements of the capacity cost calculation in the recent avoided cost proceeding in Docket Nos. 2019-185-E/2019-186-E (see page 8 of Snider Revised Exhibit 1 (which I can provide if you would like)).

Please let me know if there are further questions.

Thanks,
Rebecca

From: Butler, David <David.Butler@psc.sc.gov>
Sent: Tuesday, September 15, 2020 2:54 PM
To: Dulin, Rebecca Jean <Rebecca.Dulin@duke-energy.com>
Cc: Smith, Heather Shirley <Heather.Smith@duke-energy.com>; Nelson, Jeff <jnelson@ors.sc.gov>; Dover, Becky <BDover@scconsumer.gov>; Grube-Lybarker, Carri <clybarker@scconsumer.gov>; Bateman, Andrew <abateman@ors.sc.gov>; Edwards, Nanette <nedwards@ors.sc.gov>; richard@rlwhitt.law; Samuel Wellborn <swellborn@robinsongray.com>; fellerbe@robinsongray.com; J. Blanding Holman <bholman@selcsc.org>; Jamey Goldin google <jameygoldin@google.com>; Weston Adams <weston.adams@nelsonmullins.com>; court.walsh@nelsonmullins.com; thad@votesolar.org; Powers, John <John.Powers@psc.sc.gov>; Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>
Subject: Re: [EXTERNAL] Docket Nos. 2019-224-E and 2019-225-E - Request for Confidentiality

Thanks!

Sent from my iPhone

On Sep 15, 2020, at 2:07 PM, Dulin, Rebecca Jean <Rebecca.Dulin@duke-energy.com> wrote:

David,

Thanks for your email. I'm working on a response for you and will get back with you shortly.

Thanks,
Rebecca

From: Butler, David <David.Butler@psc.sc.gov>
Sent: Tuesday, September 15, 2020 12:38 PM
To: Smith, Heather Shirley <Heather.Smith@duke-energy.com>; Dulin, Rebecca Jean <Rebecca.Dulin@duke-energy.com>; Nelson, Jeff <jnelson@ors.sc.gov>; Dover, Becky <BDover@scconsumer.gov>; Grube-Lybarker, Carri <clybarker@scconsumer.gov>; Bateman, Andrew <abateman@ors.sc.gov>; Edwards, Nanette <nedwards@ors.sc.gov>; richard@rlwhitt.law; Samuel Wellborn <swellborn@robinsongray.com>; fellerbe@robinsongray.com; J. Blanding Holman <bholman@selcsc.org>; Jamey Goldin google <jameygoldin@google.com>; Weston Adams <weston.adams@nelsonmullins.com>; court.walsh@nelsonmullins.com; thad@votesolar.org
Cc: Powers, John <John.Powers@psc.sc.gov>; Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>
Subject: [EXTERNAL] Docket Nos. 2019-224-E and 2019-225-E - Request for Confidentiality

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To the Duke Attorneys in this Docket:

I hope everyone is doing well! The Commission Staff has a question related to the revised filings in the above-noted Dockets in the IRP cases, dated September 14, 2020. In the original public filing, Attachment I, Table 2 completely redacted both the Current and the Projected Avoided Energy and Capacity Costs. The September 14, 2020 revision gave us an unredacted version of most of the Current Avoided Energy and Capacity Costs in that Table, with the exception of one column. In both the original and the revised filing, the "Capacity Cost – Installed CT Cost (\$/KW)" column in the Current section was redacted. We have searched through the materials accompanying the filings, but cannot determine an explanation for why this column was left redacted in the latest filing, while all the other columns showing current cost were unredacted. Can someone please give me an explanation?

Thanks so much in advance for your help and consideration.

Regards,

David Butler

Special Counsel

Public Service Commission of South Carolina